Bill of Complaint

No. 4057 Equity.

To the Hon the Judges of the Circuit Court for Frederick County, sitting in Equity.

Humbly Complaining showeth unto your Honors your Oratrix Susanna E Shaw of Carroll County State of Maryland that heretofore to wit: on or about the day of March 1874 a certain Solomon Krise late of said County died seized and possessed in fee of certain Real Estate lying and being situate in said County and State adjoining the lands of a certain Joseph Frosee Samuel Maxwell and John Knode and containing Sixty nine and one half acres more or less, that said Solomon Krise died intestate leaving him surviving Mary Ann Krise his widow about Sixty Seven years old and the following children to wit: 1 your Oratrix Susanna E Shaw wife of Thomas Shaw deceased living in Carroll County. 2 Elmira Krouse wife of James Krouse 3 and Elbridge Krise both living in Frederick County, that said Real Estate of the said Solomon Krise decd descended to his said Children as heirs at law and is now owned by them as tenants in common And your Oratrix further charges that it will be for the advantage of as well the other heirs at law of said Solomon Krise as of your Oratrix to sell the aforesaid Real Estate and to divide the proceeds thereof between the parties in the proportion to which they may be respectively entitled, and your Orator has applied to the said Elmira Krouse and to the said Elbridge Krise and requested them to unite with your Oratrix in making sale thereof upon terms which would be convenient and beneficial to all parties, but these requests have been utterly rejected and your Oratrix is advised that she must remain without remedy unless this Court will interfere in her behalf. To the end therefore that the said Elmira Krouse and James Krouse her husband and the said Elbridge Krise and the said Mary Ann Krise the widow may answer the premises and that a decree may be passed for the sale of the aforesaid land and the proceeds of said sale be distributed between said parties in the proportions to which they may be respectively entitled, and that your Oratrix may have such further and other relief as her case may require, May it please your Honors to grant unto your Oratrix the Writ of Subpoena directed to the said Elmira Krouse and James her husband and Elbridge Krise and Mary Ann Krise widow commanding them and each of them to be and appear in your Hone Court on some certain day to be named therein to answer the premises and to abide by and perform such decree as may be passed therein.

And as in duty bound your Oratrix will ever pray&c

Fred J Nelson
Sol for Complt

Filed March 23 1875.

Subpoena

Maryland Sct:

Seal of Court

The State of Maryland to Elmira Krouse and James Krouse her husband Elbrge Krise & Mary Ann Krise widow of Frederick County Greeting. You are hereby commanded that all excuses set apart, you personally appear before the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity, to be held at the Court House in Frederick Town in and for said County on the 2nd Monday of May next to answer the bill and complaint of Susanna E Shaw against you in said Court exhibited and so forth. Hereof fail you not as you will answer the contrary at your peril Witness the Honorable Richard J Bowie Chief Judge of our said Court the 15th day of Feby 1875. Issued the 23rd day of March 1875 To the Sheriff of Frederick County.

Endorsed Summ. Thos E Willard Shff Filed April 9. 1875. Thomas Gorsuch Clerk.